

# EXHIBIT 9

## Denise Lunsford

---

**From:** Siegel, Joshua <jsiegel@cooley.com>  
**Sent:** Tuesday, June 30, 2020 2:59 PM  
**To:** Denise Lunsford ; 'Zelda Walker'  
**Cc:** 'John Hill'; 'John Zwerling'; Mills, David  
**Subject:** RE: Sines v. Kessler

If I understand you correctly, you have a folder titled "Misc Material," and it contains 18 separate files. The software does not allow you to upload a "folder." You can, however, zip the folder, which turns the folder into a file. That will allow you to upload it once, and it will include all 18 documents. Again, we're happy to get on the phone and walk you through how to do this.

If you'd like to designate documents Confidential or Highly Confidential, I suggest you name the zip folder "Confidential" or "Highly Confidential," as appropriate, and we will treat the documents in the zip folders accordingly.

---

**From:** Denise Lunsford <d@lunsford-law.com>  
**Sent:** Tuesday, June 30, 2020 2:45 PM  
**To:** Siegel, Joshua <jsiegel@cooley.com>; 'Zelda Walker' <Zelda@poindexterhill.com>  
**Cc:** 'John Hill' <john@poindexterhill.com>; 'John Zwerling' <jz@zwerling.com>; Mills, David <dmills@cooley.com>  
**Subject:** RE: Sines v. Kessler

[External]

---

For example, I have a file titled "Misc Material". Within that file there are 18 separate documents. In the link, I can choose the file but then must upload each document within that file separately. I can do that if that is what is called for. But it will take time and I want to make sure you understand that in light of the payment matter. I already have a lot of hours invested since Friday.

---

**From:** Siegel, Joshua <jsiegel@cooley.com>  
**Sent:** Tuesday, June 30, 2020 2:41 PM  
**To:** Denise Lunsford <d@lunsford-law.com>; 'Zelda Walker' <Zelda@poindexterhill.com>  
**Cc:** 'John Hill' <john@poindexterhill.com>; 'John Zwerling' <jz@zwerling.com>; Mills, David <dmills@cooley.com>  
**Subject:** RE: Sines v. Kessler

Denise, the upload link allows any file type to be uploaded, and we're happy to walk you through it. What do you mean by "a file with numerous documents"?

---

**From:** Denise Lunsford <d@lunsford-law.com>  
**Sent:** Tuesday, June 30, 2020 2:38 PM  
**To:** Siegel, Joshua <jsiegel@cooley.com>; 'Zelda Walker' <Zelda@poindexterhill.com>  
**Cc:** 'John Hill' <john@poindexterhill.com>; 'John Zwerling' <jz@zwerling.com>; Mills, David <dmills@cooley.com>  
**Subject:** RE: Sines v. Kessler

[External]

Joshua

I have gone to the link to start uploading documents. Unfortunately, it will not allow me to upload a file with numerous documents which presents an obvious problem. I am happy to drop the items to an external drive and mail to you. Additionally, there is no mechanism by which to mark the files as "confidential" or "highly confidential".

Thanks

denise

---

**From:** Siegel, Joshua <[jsiegel@cooley.com](mailto:jsiegel@cooley.com)>

**Sent:** Tuesday, June 30, 2020 2:08 PM

**To:** Denise Lunsford <[d@lunsford-law.com](mailto:d@lunsford-law.com)>; 'Zelda Walker' <[Zelda@poindexterhill.com](mailto:Zelda@poindexterhill.com)>

**Cc:** 'John Hill' <[john@poindexterhill.com](mailto:john@poindexterhill.com)>; [z@zwerling.com](mailto:z@zwerling.com); Mills, David <[dmills@cooley.com](mailto:dmills@cooley.com)>

**Subject:** RE: Sines v. Kessler

Hi Denise,

Regarding item #1, we agree you do not need to produce publicly-filed pleadings in the *Evans v. Platania* case.

For item #3, we agree you do not need to produce copies of sealed search warrants that do not contain documents or information responsive to the search warrants.

THANK YOU

---

**From:** Denise Lunsford <[d@lunsford-law.com](mailto:d@lunsford-law.com)>

**Sent:** Tuesday, June 30, 2020 10:50 AM

**To:** Siegel, Joshua <[jsiegel@cooley.com](mailto:jsiegel@cooley.com)>; 'Zelda Walker' <[Zelda@poindexterhill.com](mailto:Zelda@poindexterhill.com)>

**Cc:** 'John Hill' <[john@poindexterhill.com](mailto:john@poindexterhill.com)>; [z@zwerling.com](mailto:z@zwerling.com)

**Subject:** RE: Sines v. Kessler

[External]

---

Joshua

I am continuing to work on the documents responsive to the subpoenas. John and I have essentially the same information so the bulk of the response will be from me when I upload files electronically. If John has anything different which is not work product, which I doubt, I will ask him to upload that himself. Regarding your response, below, I have additional questions.

1. You have agreed that we not produce pleadings filed in this case. Does that agreement extend to pleadings filed in the matter of *Evans v. Platania* in which William Evans filed pleadings to intervene in the case of *Commonwealth v. Fields* – essentially a FOIA dispute between Mr. Evans and Joe Platania?
2. Items 3 & 4 regarding discovery from the Commonwealth and the AUSA will be addressed in the conference call this afternoon.
3. Item 6, "documents obtained from the clerk" refers to copies of sealed search warrants which are on file in the Charlottesville Circuit Court. They were sealed on Motion of the Commonwealth and an Order was entered allowing us to copy as counsel for Mr. Fields. These records DO NOT contain documents or information responsive to the search warrants.

Thank you

denise

---

**From:** Siegel, Joshua <[jsiegel@cooley.com](mailto:jsiegel@cooley.com)>

**Sent:** Thursday, June 25, 2020 12:34 PM

**To:** Zelda Walker <[Zelda@poindexterhill.com](mailto:Zelda@poindexterhill.com)>

**Cc:** John Hill <[john@poindexterhill.com](mailto:john@poindexterhill.com)>; [d@lunsford-law.com](mailto:d@lunsford-law.com); [z@zwerling.com](mailto:z@zwerling.com)

**Subject:** RE: Sines v. Kessler



John,

Thank you for your letter. As to the numbered items listed in your letter:

1. We agree you do not have to produce filed pleadings.
2. Please be more specific about what you mean by "Trial preparation."
3. Please produce all discovery obtained from the Commonwealth of Virginia, per the Court's order.
4. Please produce all discovery obtained from the Commonwealth of Virginia, even if the Commonwealth obtained it from the United States government or it was separately provided to you by the United States government.
5. As we have said, and the Court confirmed, we do not seek information about jurors.
6. Please be more specific about what you mean by "documents obtained from the Clerk."
7. Please produce the media accounts.
8. Please produced the unsolicited emails from third parties.
9. Please produce the historical information about your client.

---

**From:** Zelda Walker <[Zelda@poindexterhill.com](mailto:Zelda@poindexterhill.com)>

**Sent:** Wednesday, June 24, 2020 5:07 PM

**To:** Siegel, Joshua <[jsiegel@cooley.com](mailto:jsiegel@cooley.com)>

**Cc:** John Hill <[john@poindexterhill.com](mailto:john@poindexterhill.com)>; [d@lunsford-law.com](mailto:d@lunsford-law.com); [z@zwerling.com](mailto:z@zwerling.com)

**Subject:** Sines v. Kessler

[External]

---

Good Afternoon Mr. Siegel,

Please review the attached letter per Attorney John I. Hill.

Thank You,

Zelda Walker

Paralegal to John I. Hill, Esquire &

K. Wayne Glass, Esquire

POINDEXTERHILL, P.C.

404 South Wayne Avenue

Waynesboro, Virginia 22980

Telephone: (540) 943-1118

Facsimile: (540) 949-6476

Please Review

---

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

FIGURE 1641P

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

FIGURE 1641P

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

FIGURE 1641P

FIGURE 1641P

FIGURE 1641P

FIGURE 1641P

FIGURE 1641P

FIGURE 1641P